

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF SAGINAW
FAMILY DIVISION

MELISSA JAYNE CALICE,

Plaintiff,

vs.

RICHARD ANTHONY CALICE, JR.,

Defendant.

File No. 12-017215-DM-1

HON. JAMES T. BORCHARD

BURKHART, PICARD,
TIDERINGTON, & McLEOD, PLLC
BY: TIMOTHY R. McLEOD (P29880)
THOMAS D. BURKHART (P25509)

Attorneys for Plaintiff
820 N. Michigan Avenue
P.O. Box 6055
Saginaw, Michigan 48608
(989) 753-4441

RICHARD ANTHONY CALICE, JR.
Defendant In Pro Per
10 Ringleaf Court
Cockeysville, Maryland 21030

PLAINTIFF'S TRIAL BRIEF

Prepared By:

BURKHART, PICARD,
TIDERINGTON, & McLEOD, PLLC
BY: TIMOTHY R. McLEOD
Attorney for Plaintiff
820 N. Michigan Avenue
P.O. Box 6055
Saginaw, Michigan 48608

GENERAL INFORMATION

Date of Marriage: August 6th, 2005

Date of Separation: August 2nd, 2012

Date of Filing: August 13th, 2012

Parties:

Plaintiff: Melissa Jayne Calice

Date of Birth: 12/01/1974

Health: Good.

Employment: North Saginaw Charter Academy - School Social Worker

Income: 2013 Income was \$40,218.00

Number of Marriage: First

Defendant: Richard Anthony Calice, Jr.

Date of Birth: 12/12/1978

Health: Good.

Employment: Catered Occasions, LLC a/d/b/a Borowiecki & Associates

Income: \$6,400.00 per month

Number of Marriage: First

Issues:

Property Division

Retirement Plans

Spousal Support

Attorney Fees

BURKHART, PICARD, TIDERTON, & McLEOD, P.L.L.C., 820 NORTH MICHIGAN AVENUE, P.O. BOX 6055, SAGINAW, MICHIGAN 48608

BACKGROUND INFORMATION

The parties were married on August 6th, 2005 in Charlevoix, Michigan. Two children were born during the marriage: Rocco Jefferson Calice, d/o/b 10/27/2006 and Amelia Jayne Calice, d/o/b 04/25/2008. The parties separated on August 2nd, 2012 at which time Plaintiff, Melissa Jayne Calice returned to her home state of Michigan with the two minor children. Plaintiff, Melissa Jayne Calice initiated a Separate Maintenance proceeding on August 13th, 2012 which was subsequently amended to a divorce proceeding on September 13th, 2012.

Defendant holds a bachelor's degree and MBA. He was employed with FEI.COM until February, 2014. In July, 2014, he began employment with his current employer, Catered Occasions, LLC a/d/b/a Borowiecki & Associates. His current income is \$6,400.00 per month.

Plaintiff holds a bachelor's degree and Master's in Social Work. She has a Michigan teaching certificate and a license for Social Work in the State of Michigan. She is currently employed at North Saginaw Charter Academy and earns an annual income of \$40,218.00.

The parties' essentially lived apart from October, 2009 to October, 2011. Plaintiff lived in the parties' home in Royal Oak, Michigan with the minor children and Defendant lived and worked in Maryland; returning home on the weekends. In October, 2011, in an attempt to save their marriage, Plaintiff relocated to the State of Maryland with the minor children. Defendant reassured Plaintiff their marriage could be saved if she relocated and if the attempt failed, she could return to the State of Michigan. The parties attended counseling in a final attempt to save the marriage. The end result was Plaintiff returning to the State of Michigan on August 2nd, 2012 with the minor children and filed a Complaint for Separate Maintenance on August 13th, 2012. A First Amended Complaint For Divorce was subsequently filed on September 13th, 2012.

Defendant's counsel filed a Motion for Summary Disposition arguing that Michigan

lacked jurisdiction under the Uniform Child Custody Jurisdiction Enforcement Act (UCCJEA). Plaintiff's counsel filed responsive pleadings. The issue of jurisdiction was resolved on October 18th, 2012 when a stipulated order was entered establishing jurisdiction in the Michigan Court.

Per the Findings and Order Re: Child Support, Child Support Credit, And Spousal Support dated June 30th, 2014, Child Support is payable by Defendant to Plaintiff in the amount of \$1,820.00 per month and Spousal Support in the amount of \$534.00 per month. The Spousal Support is payable until the Kate Spade dishes are returned (unbroken) or upon entry of the Judgment of Divorce. Spousal Support collection was not enforced at the time of entry of this order due to Defendant's then unemployment status; the order further states that Spousal Support shall be paid out of his portion of the property settlement. The Spousal Support arrearage is \$8,010.00 for the period June, 2014 through August, 2015.

At all times during the pendency of this proceeding, Plaintiff has had primary physical Custody of the two minor children. Prior to December, 2014, the parties had joint legal Custody. During December, 2014, Judge Fred L. Borchard entered his order establishing sole, legal Custody with Plaintiff pending review by Jill Hogenson. Jill Hogenson issued her report which Plaintiff has objected to, recommending joint, legal Custody of the minor children with significant handcuffs being placed on Defendant in an effort to control his erratic behavior. Defendant has repeatedly indicated he does not intend to comply with court orders and continues his abusive and intimidating conduct as evidenced by various e-mails attached.

ASSETS/LIABILITIES

This is a minimal asset case. A review of the parties' financial circumstances would indicate that liabilities far exceed any assets.

Assets -

Real Property – the parties jointly owned a parcel of real estate located at 620 Catalpa, Royal Oak, Michigan. The property has been occupied by a tenant. The monthly rental amount was being deposited into the Iolita account of Plaintiff's attorney pursuant to a stipulated order dated October 1st, 2013. These monies were used to make a 1st mortgage payment to 1st State Bank and insurance premiums as they became due. Plaintiff's counsel received notification that a 2nd mortgage was in default because Defendant had not made the previous mortgage payments for the months of June, July, August and September, 2013. The monthly tenant amount was insufficient to pay on the 1st mortgage, 2nd mortgage and accruing expenses.

Following unsuccessful Mediation held in December, 2014, the property went into foreclosure with 1st State Bank and a Sheriff's Deed was recorded with the Oakland County Register of Deeds on February 24th, 2015. The redemption period ends August 24th, 2015.

Rental monies that are being held in the Iolita account of Plaintiff's counsel total \$10,890.90. This amount includes the security deposit refund of \$1,477.82.

Motor Vehicles – Plaintiff's has a high mileage Cadillac SUV.

Defendant is currently driving a vehicle acquired during the pendency of this divorce following the fire loss of his prior vehicle. Presumably, this vehicle is without debt having been paid for from the insurance proceeds. Type of vehicle and value will be determined and provided to the Court at trial.

Retirement Accounts – the marital retirement accounts include Defendant's Fidelity 401(k) Plan with a December, 2013 balance of \$46,200.00 (Defendant withdrew \$8,342.00 of this amount during June, 2014 to pay support arrearages). In addition, at the time of filing, there was a Morgan Stanley account which Defendant drew down during the pendency of the proceedings in violation of the Temporary Restraining Order. This withdraw was \$14,241.88.

Personal Property – Court Appointed Special Master, William A. Brisbois entered an order directing Defendant to return certain personal property to Plaintiff. This has yet to be complied with and a contempt finding against Defendant has already been determined.

The outstanding list of items yet to be returned to Plaintiff are as follows: Amelia's Dresser; Buffet dining room set includes Kate Spade China ; Le Creuset Pot; Le Creuset Baker; Wustoff knives; Fiesta dishes (6); Red Fiesta Dishing with serving ware; all Clad pots; Dyson vacuum cleaner; self-made given to me by friends and relatives; access to all photography physical and online; baby picture collage made for each child; Wallace Silverware; "You Are Special Today" plate; Christmas decorations including ALL small houses and churches; Calphalon 4 qt. Slow Cooker; Crockpot 1-qt. Hook Up Double Slow Cooker; wooden baskets and bedside tables on either side of the master bedroom; Dark Brown Bookshelf in basement; Amelia's American Girl Doll; Turquoise Lamp; Large red Waterford Bowl; and Crate and Barrel Mixing Bowls. The total value of the items yet to be returned is approximately \$8,023.54.

Security Deposit – During the pendency of this matter, Defendant relocated from an apartment the parties had been residing in and there was a security deposit refund due the parties in the amount of \$4,950.00. An order has been entered depositing this amount in the Iolita account of Plaintiff's attorney. The actual amount received was \$1,477.82 because the landlord debited certain expenses of Defendant including rent, water bills and repair expenses.

Liabilities –

Student Debt – During the course of the marriage, Plaintiff acquired student debt. The outstanding amount as of November 29th, 2012 totals \$109,539.39. The student debt amount was used to pay for Plaintiff's education and in addition was used to fund marital expenses while these parties were together.

Tax Liability – the parties filed separate returns for 2012.

Defendant reports unpaid federal and state taxes for 2012 in an approximate amount of \$80,000.00. Presumably, this tax liability accrued because Defendant did not pay estimated taxes for his separate return. This is a separate liability of Defendant.

Credit Card Debt – Defendant's counsel advised the Court at a previous trial date that there was approximately \$60,000.00 in outstanding credit card debt. Plaintiff has no knowledge regarding this indebtedness nor the reason for the indebtedness. Defendant has provided Plaintiff's counsel with various credit statements in Defendant's name alone to substantiate this estimated \$60,000.00. A review of these various credit card statements shows a balance of \$22,485.18 which reflects balances owed by Defendant at the time of separation. Voluminous credit card statements were provided but do not reflect credit card balances due as of the date of filing; no additional statements have been provided.

Maryland Trip Reimbursement - During the pendency of these proceedings, Plaintiff travelled to Maryland to retrieve personal property and incurred expenses including U-Haul rental, etc. Defendant refused to release personal property. Plaintiff seeks reimbursement of these expenses totaling \$5,200.00.


CONCLUSION

Accordingly, Plaintiff would request this Court:

1. Enter its order continuing primary physical Custody of the two minor children with Plaintiff and establishing sole, legal Custody for Plaintiff with directives as reflected in her proposed order filed with her objection to the Jill Hogenson's report;

2. That Plaintiff pay her student loan debt; Defendant pay his credit card debt and tax obligations;
3. The Court award each party their current motor vehicle;
4. The Court enter the following monetary award in favor of Plaintiff:
 - a. One-half of Fidelity 401(k) October, 2013 balance i.e. $\$46,200.00 \div 2 = \$23,100.00$;
 - b. One-half of Iolita trust account monies (number includes security deposit refund of \$1,477.82) $\$10,890.90 \div 2 = \$5,445.45$;
 - c. One-half of amount of monies withdrawn from the Morgan Stanley account in November, 2012 i.e. $\$14,241.88 \div 2 = \$7,120.94$
 - d. Spousal Support arrearage for the period June, 2014 through August, 2015 totaling = \$8,010.00;
 - e. Maryland trip expenses reimbursement = \$5,200.00;Total award to Plaintiff = \$48,876.39.
5. The monetary award determined above be paid to Plaintiff from Defendant as follows: assignment of Fidelity 401(k) Plan (\$37,858.00) and assignment of Plaintiff's counsel's Iolita account monies (\$10,890.90).
6. Such other appropriate relief as deemed fair and equitable by this Court including attorney fees and costs.

Respectfully Submitted,


TIMOTHY R. McLEOD (P29880)
Attorney for Plaintiff

Dated: August 6, 2015

BURKHART, PICARD, TIDERTON, & McLEOD, P.L.L.C., 820 NORTH MICHIGAN AVENUE, P.O. BOX 6055, SAGINAW, MICHIGAN 48608

ASSETS/LIABILITIES

ASSETS

Real Estate

620 Catalpa
Royal Oak, MI

Foreclosed upon by 1st
State Bank

-0-

Motor Vehicles

Cadillac

Plaintiff;
Net Value

Minimal

Defendant's Motor
Vehicle

Minimal

Retirement Accounts

Fidelity 401(k) Plan

Defendant;
Balance as of 10/2013

\$46,200.00

Balance as of 6/2014 after
Defendant withdrew monies
to pay support - \$37,858.00

Morgan Stanley
Account# 310-137762

Balance before withdrawal
in violation of Temporary
Restraining Order 11/23/12

\$14,241.88

Security Deposits

Unrefunded security deposit from
Maryland property

*\$4,950.00

*\$1,477.82 of the security deposit amount was received because accrued debts of Defendant.

Liabilities

-Student Loans

Nelnet – Stafford
Loans

Plaintiff; Balance as of
11/29/2012

(\$30,694.27)

Direct Loans -

Plaintiff – Balance as of

Unsubsidized	11/29/2012	(\$71,165.39)
Direct Loans - Subsidized	Plaintiff – Balance as of 11/29/2012	(\$ 7,679.73)
tCredit Card Debt	Defendant	?
Unpaid Individual Tax Liability	Defendant	?
<u>Miscellaneous</u>		
Value of unreturned personal property to Plaintiff		\$8,023.54
TRM Iolita account		\$10,890.90

PROPERTY DIVISION

ITEM

PLAINTIFF

DEFENDANT

Real Estate

620 Catalpa
Royal Oak, MI

-0-

-0-

Motor Vehicles

Cadillac

X

Defendant's Motor
Vehicle

X

Retirement Accounts

Fidelity 401(k) Plan

\$23,100.00

\$23,100.00

Morgan Stanley
Account# 310-137762

\$ 7,120.00

\$ 7,120.00

Miscellaneous

Value of unreturned
Personal Property

\$ 8,023.54

Subject: Fwd: I need to meet with you regarding the 2012 Hemeter elementary sexual assault on my then 6 y/o son

From: Tony Calice (tony.calice@gmail.com)

To: mjwcalice@gmail.com; bptm4@ameritech.net;

Date: Monday, December 15, 2014 2:33 PM

Hey guys

Sounds like we are meeting to talk about the Sexual Assault on Rocco. The question is, will Mary be advocating for the victim or trying to conceal it like Melissa's sexual assaults when she was a minor and pursuing diagnosis of mental illness?

I would like to forward you this thread as Melissa's YMCA of Maryland Email Address is no longer active.

Thanks,

- Tony

----- Forwarded message -----

From: Tony Calice <tony.calice@gmail.com>

Date: Mon, Dec 15, 2014 at 2:26 PM

Subject: Re: I need to meet with you regarding the 2012 Hemeter elementary sexual assault on my then 6 y/o son

To: Susan Prine <sprine@saginawcounty.com>

Cc: James Bailey <jcbailey@stcs.org>, Melissa Calice <melissacalice@ymaryland.org>, DOUGLAS TROMBLEY <DATROMBL@stcs.org>

Ms. Prine,

Thank you for your prompt attention to the Child Endangerment Issues that I hope will result in improved safety for all minors involved. I will meet on Thursday and our discussions will be transparently recorded. I will not honor Saginaw Court's desire to conceal the Saginaw Sponsored kidnapping and Sexual Assault of a minor.

Bottom Line: Rocco did everything you could ask of a young boy that was kidnapped and sexually assaulted by Saginaw, MI

- 2013
 - Rocco told his mother
 - Rocco to a supervision
 - Rocco told Court that promised to investigate this bully
- 2014 Rocco told his father no one did anything and that he was sexually assaulted

ISSUE:

- Sexual Assault of Minor in 2013
- Saginaw Court Neglect to investigate abuse and joint legal custody violation despite being informed by child in November of 2013.

Court rules for Thursday's Proceeding

Due to the questionable principals in Saginaw County, I am requesting permission to preserve our proceedings with video. The Saginaw Court actions will be subject to future intelligent conversations with principle'd elected officials intent on protecting minors from Conspiracy to Kidnap and Conceal Sexual Assault on a Minor.

Requested Witnessed:

- Officer Rania (sp?)
- Jill Hogenson
- Honorable Fred Bourchard
- Hall or his legal guardian
- ***If Rocco is correct, than Hall is likely in immediate danger and a sexual assault victim himself
- First State Bank President - Rick Goedert conspired to kidnap minor across state lines with identity fraud
- Maternal Grandmother - Mary Goedert that conspired to conceal sexual assault
- Paternal Grandmother - Ruth Anne Calice witnessed Officer Renia indicate that he had an interview with Rocco on 2013
- Former Attorney for Defendant - Tom Demetrio witnessed Officer Renia indicate that he had an interview with Rocco on 2013
- Jim Bailey - Principal of Hemmeter elementary
- Lisa Morford - Rocco's teacher at time of incident
- Negligent Saginaw Provider that misdiagnosed sexual assault as ADHA - Sandy Pfander
- Sue Prine - Negligent Saginaw Friend of the Court that Endorsed misdiagnosis of ADHD

Home State of Maryland

It's deeper here.
ymaryland.org

Maryland Plaintiff
Richard A. Calice Jr.
Maryland Driver's License
Issued 6/7/2012

Remember Your Visit!
To National Aquarium
View, Purchase and Share your Official National Aquarium Photos!


Maryland Residents immediately
prior to the 2012 Saginaw
Sponsored Kidnapping

7/28/2012: The Maryland Calice family visits the aquarium with their family membership.

Pictured (left to right): Son Rocco, Mother Melissa, Daughter Mia, and Father Tony

St. Paul's Lutheran Church
Lutherville, Maryland

York Manor Swim Club



Saginaw Conspiracy to violate Michigan Principles

"The office is mandated by the Michigan Constitution and in accordance with Michigan Law is an elected office with a term of four years"
 source: Saginaw Clerk

2012 Saginaw Kidnapping of Oakland County, MI and Maryland Children from home state of Maryland. Saginaw neglected to report kidnapping.

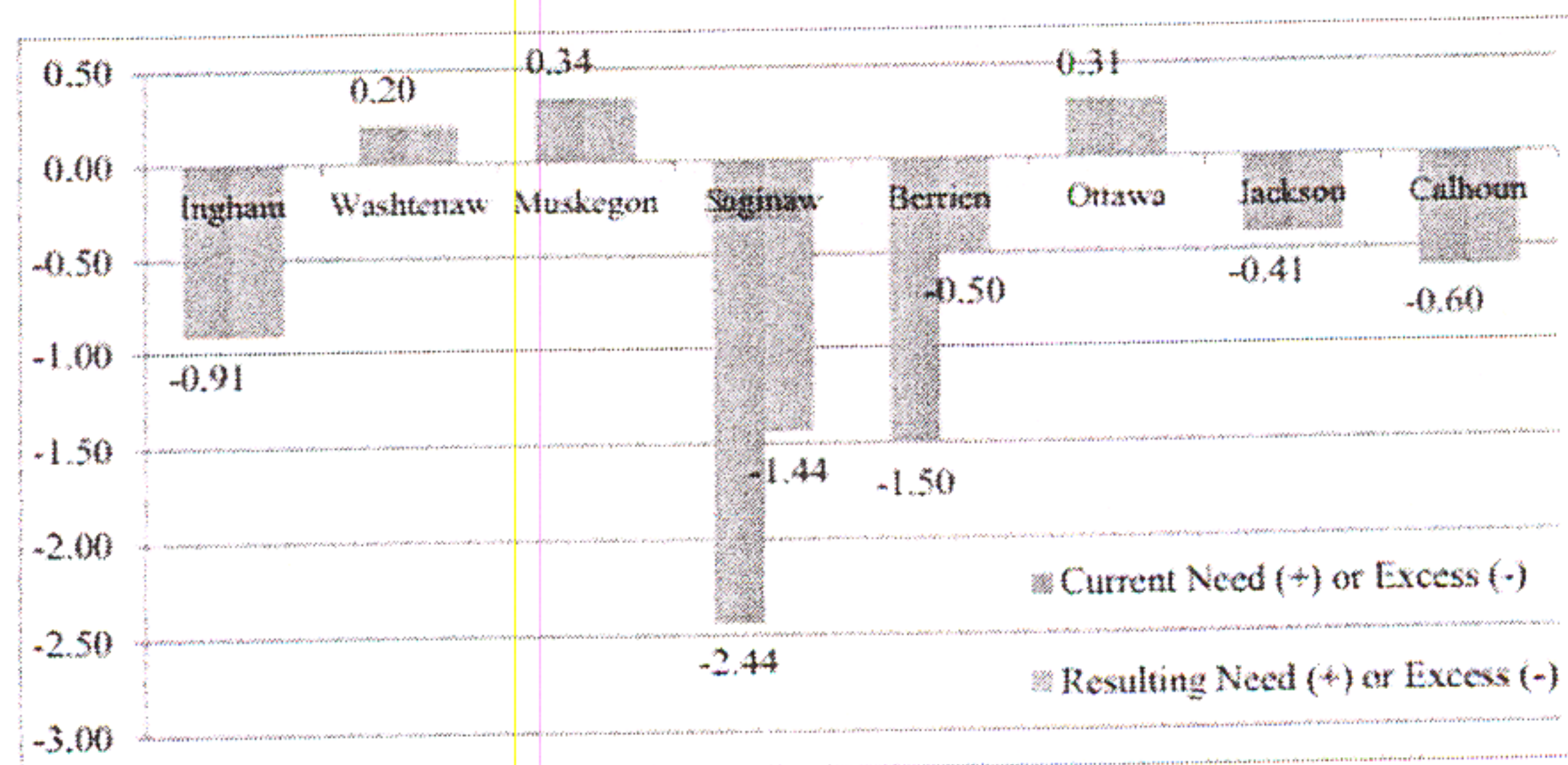
Saginaw Court aware of 2013 telltale warning signs of Saginaw Child Abuse. In addition child tells Chief Judge Honorable Fred L. Borchard tells court about bully. Judge promises to investigate. Saginaw Court neglected to contact Saginaw school and child is sexually assaulted by the bully.

2014 Thanksgiving child tells his Maryland father that 2013 bully sexually assaulted him and that he told his mother, "school supervisor", and even the judge about this bully. Father shares concern with mother, school, and court.

"In order to file either a divorce or a separate maintenance action in Michigan, you must swear out a complaint stating that you have lived in Michigan for 180 days and in Saginaw County for 10 days before filing. Obviously, that isn't the case here. So, I don't know how Melissa or her lawyer can do that but apparently they did." (John Mills, 8/14/2012)

Comparable Courts

County	Census	Total Workload in Minutes	Judges Needed	Current			Recommended		
				Judge -ships	Need or Excess	Work-load Per Judge	Judge -ships	Need or Excess	Work-load Per Judge
Ingham	280,895	1,440,485	10.09	11	-0.91	92%	11	-0.91	92%
Washtenaw	344,791	1,391,604	10.20	10	0.20	102%	10	0.20	102%
Muskegon	172,188	1,336,427	10.34	10	0.34	103%	10	0.34	103%
Saginaw	200,169	1,310,094	10.56	13	-2.44	81%	12	-1.44	88%
Berrien	156,813	1,173,126	9.50	11	-1.50	86%	10	-0.50	95%
Ottawa	263,801	1,154,019	9.31	9	0.31	103%	9	0.31	103%
Jackson	160,248	1,067,108	8.59	9	-0.41	95%	9	-0.41	95%
Calhoun	136,146	1,031,472	8.40	9	-0.60	93%	9	-0.60	93%



By the way, here is an updated photo for Honorable Bourchard's Desk. I hope that looking at it will remind him about how serious Saginaw Child Endangerment it. This is the type of thing that happens Saginaw Sponsor's Kidnapping.



On Mon, Dec 15, 2014 at 8:15 AM, Susan Prine <sprine@saginawcounty.com> wrote:

I was out of the office Friday when these e mails came in. I contacted Judge Fred Borchard and he wants to know when you will be in town Thursday as, rather than going to the school, he wants this brought before him. Let me know when you will be arriving and I will get a hearing time from the Judge. Mr. Bailey has told me he will be there, I will be there, and both parties, as well as your wife's attorney. I need this info asap so I can get a hearing before the judge arranged with his schedule.

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

Subject: Re: Important Account Notice

From: Tony Calice (tony.calice@gmail.com)

To: reply-fe6616707d64047b751d-4039297_HTML-169097513-10060849-0@noreply.michiganlottery.com;

Cc: rickg@1ststatebk.com; sprine@saginawcounty.com; mrgoedert@gmail.com; bptm4@ameritech.net;

Date: Tuesday, April 28, 2015 4:25 PM

Also human trafficking at 62 Corral Dr.

The judge is in on it.


<http://tonycalice.wikispaces.com/similar+negligence>

On Apr 28, 2015 4:23 PM, "Tony Calice" <tony.calice@gmail.com> wrote:

My identity has been stolen by Tim McLeod.

<http://tonycalice.wikispaces.com/forbank>

On Apr 28, 2015 4:01 PM, "Michigan Lottery" <reply@noreply.michiganlottery.com> wrote:

VIEW ONLINE 



PLAYERS CLUB

Hi RICHARD!

• You Have 0 Points •

Log In

Dear RICHARD,

Starting April 29, 2015, Michigan Lottery accounts will be restricted to Michigan residents, and your account, which is associated with an out-of-state address, will be deactivated. If you currently have a Michigan address associated with your Michigan Lottery account please disregard this message.

Following this deactivation, you will no longer be able to login or participate in Players Club or Buy Online activities. **All funds and point balances remaining in your account after April 29 will expire.** You will have an opportunity to cash out any deposit balance remaining in your account from April 27-28, 2015. Stipulations may apply. Please contact customer service if you have any questions. If you have a balance of Reward Points in your account, we encourage you to redeem them in the Rewards Catalog. Any drawing entries you submit before April 29 will be valid.

If you have any questions, would like to request a withdrawal, or are currently a Michigan resident, please contact our customer service team at 844-887-6836. If you are a Michigan resident, proof of address and identity will be required to update your account.

This change only impacts Internet activities and does not impact the purchase and redemption of tickets at Michigan Lottery retailers. When in Michigan, we hope you continue to visit Michigan Lottery retailers to purchase a ticket for a chance to win cash prizes.

We apologize for any inconvenience and thank you for your support of the Michigan Lottery!



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Michigan Lottery, 101 E. Hillsdale, P.O. Box 30023, Lansing, MI 48909



If you bet more than you can afford to lose, you may have a problem.
HELPLINE | 1-800-270-7117
TEXT | 248-648-3363

Subject: Re:

From: Tony Calice (tony.calice@gmail.com)

To: tjd@tomdemetriou.com;

Cc: sbernardoni@saginawcounty.com; rickg@1ststatebk.com; SABabcock@wwrplaw.com; bptm4@ameritech.net; jbundgaard@michiganpropertymanagers.com; sprine@saginawcounty.com; mjlw74c@yahoo.com;

Date: Sunday, May 31, 2015 11:38 AM

Can Tom Demetriou explain how a forged passport appeared on my jail booking information.

You had the proper spelling of my name on the Maryland driver's license I presented at booking.

Does rural Michigan Town judge Fred Bouchard now have the authority to revoke US Citizen status?

-t

On May 27, 2015 11:36 AM, "Tony Calice" <tony.calice@gmail.com> wrote:

Tom,

You can travel to 820 N. Michigan Ave. to collect your apology from the individuals utilizing my identity for concealing revenue.

Or the illegal immigrant "Anothy Calice" that spent some time in the Saginaw County Jail.

<http://tonycalice.wikispaces.com/forjail>

-Tony

On May 27, 2015 11:22 AM, "Tom Demetriou" <tjd@tomdemetriou.com> wrote:

Tony,

I do believe it is my ethical obligation not to disclose any issues you and I may have had. I did not believe we had any.

I have never let your inability to pay my fees in any way diminish my level of representation of you.

This last email from you is insulting to say the least.

We have always transmitted to you all documents, offers, and everything else we ever received on your behalf.

I do believe an apology is in order but that is up to you.

Tom

Demetriou & Associates, P.C.

Attorneys at Law

3262 Cabaret Trail, Suite 206

Saginaw, Michigan 48603

(989) 793-6440

Confidentiality Notice: Unless otherwise indicated or obvious from the transmission, the information contained in this document is privileged and confidential information intended for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify the sender and destroy the original message.

Subject: RE: Re: Child Endangerment - Unable to talk to the 62 Corral Dr Saginaw, MI human trafficking victims

From: Tony Calice (tony.calice@gmail.com)

To: sprine@saginawcounty.com;

Cc: rickg@1ststatebk.com; kennywbertram@sbcglobal.net; jcbailey@stcs.org; bptm4@ameritech.net; lamorfor@stcs.org; mjw74c@yahoo.com; mrgoedert@gmail.com;

Date: Monday, June 1, 2015 8:53 AM

Ms. Prine,

You are unapologetic in your lack of urgency and transparency regarding the two children kidnapped by residents in your rural Michigan community of Saginaw (made possible by forged documents and \$150 "filing fee" furnished by attorney Tom.McLeod).

I look forward to your furnishing the documentation of the CPS report and ensuring that no one is "on vacation" on date of trial.

-t

On May 27, 2015 7:29 AM, "Tony Calice" <tony.calice@gmail.com> wrote:

"How would the judge even know who to subpoena if you can't even remember who you reported this to at CPS or furnish this concealed report you claim to have?

We need to move the trial up so that no one is out of town on vacation.

On May 27, 2015 7:01 AM, "Susan Prine" <sprine@saginawcounty.com> wrote:

No. Information is confidential. Subpoena PS worker. I don't know who it was but the judge can order them at trial to testify as to their investigation

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

TopSecret

Don't Go There Topics (Red Flag):

- The Saginaw, Michigan "don't go there topic" is: Endangered Maryland children enticed by Saginaw Michigan adults for a "10 day vacation". #ForgedCourtForms \$150 #BRIBE

On the copy are

- Kenny Bertram - Psychiatric Opinion
- Sue Prine - Michigan Court (Sue Prine)
- Similar Negligence
 - LISA BARTEL <labartel@stcs.org> ,
 - LISA MORFORD <lamorfor@stcs.org> ,
 - JAMES BAILEY <jcbailey@stcs.org> ,
 - DOUGLAS TROMBLEY <DATROMBL@stcs.org> ,
- Multiple parties that have assumed the identity of a person once known as Melissa Calice (43 Winterberry Ct/Cockeysville, MD 21030)
 - Mary Alice Goedert <mrgoedert@gmail.com> Simple Case of Saginaw, Michigan Identity Fraud ,
 - "Mr. and Mrs. Rick Goedert" <rickg@1ststatebk.com> - ForBank ,
- "Mr. Timothy McLeod" - Tim McLeod
- the school officials that "don't go there" to help vulnerable children, the court that accepted forged documents from Tim McLeod, and the multiple parties that have assumed the identity of a person once known as Melissa Calice (43 Winterberry Ct/Cockeysville, MD 21030).

Response to your request to participate in Saginaw conspiracy of "Don't go there topics": Rocco and Mia are entitled to their ideas and emotions. Please allow me to contact our children via phone and FaceTime while "theories" pertaining to rural town kidnapping are discussed by authority figures. To that end, I have organized some thoughts on that theory: <http://tonycalice.wikispaces.com/thoughts>
My knobs are that:

- 1) Our children, Rocco and Mia need to return to their home in Maryland where all conversations, emotions, and ideas are safe. They have at least one stable, resilient, parent with an awesome job in Maryland.
- 2) I look forward to continuing this constructive dialogue on pubic record.
- 3) The adults involved (everyone on the copy) need to assess damages and repair the disaster that was sponsored by 62 Corral Dr/Saginaw, MI (Rick and Mary Goedert). The attorney Tim McLeod of 820 N. Michigan Ave/Saginaw, Michigan was hired by them to abuse the legal process with forged documents and pay a "filing fee" so that the court clerk would rubber stamp the documents with the word "true".
- 4) The IRS and Maryland need to be made whole from the funds being embezzled in Michigan. My creditors need to be made whole so that my security clearance with homeland security can be restored.
- 5) I need my lost wages/revenue replaced. I need legal clarification that Melissa Calice does not represent the interest of children Rocco and Mia so that I can give them the childhood that will prepare them for success and joy in their adult life. That clarification needs to come from a Maryland court (once

Michigan dismisses fraudulent legal filings with prejudice).

6) You need a safe environment around positive people that admire instead of envy success.

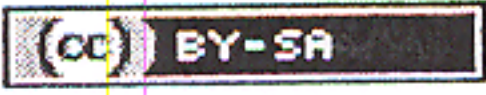
7) Tom Demetriou has an outstanding legal bill of approximately 30k that needs to be paid

Bottom line: This problem can't be resolved until the rural town of Saginaw stops kidnapping and endangering my children.

10 Ringleaf Movies: Movies

10 Ringleaf Printers:

- Main Floor: Multi-Function Printer
- Basement: Laser Printer
- Basement: Scanner <http://192.168.1.18/index.asp>

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Portions not contributed by visitors are Copyright 2015 Tangient LLC

Subject: Re: hearing
From: Tony Calice (tony.calice@gmail.com)
To: sprine@saginawcounty.com; msp-missingpersons@michigan.gov;
Cc: rickg@1ststatebk.com; kennywbertram@sbcglobal.net; jcbailey@stcs.org; bptm4@ameritech.net; lamorfor@stcs.org; mjw74c@yahoo.com; mrgoedert@gmail.com;
Date: Monday, July 13, 2015 3:36 PM

Attention Michigan State Police, how do I recover Maryland children from the Saginaw, MI kidnapping ring operating out of Fred Bourchard's courtroom.

Kidnapping sponsor Rick Goedert (62 Corral Dr/ Saginaw, MI) hired Saginaw, MI Tim McLeod (820 N. Michigan Ave Saginaw, MI) to produce and file counterfeit and forged legal documents regarding the identities of children across state lines. Saginaw Court Clerk (in exchange for \$150) neglected to verify residency and stamped the word "true" on the counterfeit document.

A forensic investigation (I have made report publicly available here: <http://tonycalice.wikispaces.com/onemansopinion>) has been performed and validates the truth of my claims and the true danger Saginaw, MI represents to the liberty and safety of Maryland children.

Legal action has been filed in the home state of Maryland; however, Michigan kidnapping sponsor Rick Goedert continues to interfere by paying to forge signatures on rural Michigan document. As the State of Michigan very well knows, the residence of Melissa and Tony Calice is in Maryland.

Sincerely,

Tony Calice

mobile: 248.506.2138

On Tue, Jul 7, 2015 at 4:26 PM, Tony Calice <tony.calice@gmail.com> wrote:
Ms Prine,

Saginaw, Michigan Court entered into a Creative Commons contract when they admitted materials from my wikispaces site into evidence. As such, I am requesting under the "Share alike" clause of the contract that you immediately disclose the findings of the CPS report and the Ms. Hogenson's Report.

Should I file this under "Similar Negligence" or under the "Sue Prine" record?

Sincerely,

- Tony Calice

On Tue, Jun 23, 2015 at 5:44 AM, Susan Prine <sprine@saginawcounty.com> wrote:

Plz note for anyone who is going to be at the hearing in late July. It has been reset to a different (earlier) date due to the judge being available. It was reset by the court – it is now scheduled for July 15th at 9 am.

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

Subject: RE: Re: Child Endangerment - Unable to talk to the 62 Corral Dr Saginaw, MI human trafficking victims

From: Tony Calice (tony.calice@gmail.com)

To: sprine@saginawcounty.com;

Cc: sbernardoni@saginawcounty.com; rickg@1ststatebk.com; kennywbertram@sbcglobal.net; jcbailey@stcs.org; bptm4@ameritech.net; lamorfor@stcs.org; mjlw74c@yahoo.com;

Date: Wednesday, May 27, 2015 8:23 AM

What unknown country issued the passport for Anothny Calice? This illegal immigrant looks a lot like the Maryland resident Richard Anthony Calice, Jr.

By the way, you falsified my identity in the jail booking system. I provided you my Maryland drivers license and you created a fake passport record for an "Anothny Calice"

<http://tonycalice.wikispaces.com/forjail>

On May 27, 2015 6:12 AM, "Tony Calice" <tony.calice@gmail.com> wrote:

I think we need to shorten the feedback cycle on quality of that report. Please provide evidence that you initiated a report (ie referral information, contact, and release)

Due to a lack of transparency on your part, we have a nightmare on our hands.

On May 27, 2015 5:13 AM, "Susan Prine" <sprine@saginawcounty.com> wrote:

We dont do the investigation when we refer a case to PS/DHS for possible abuse – they are a state agency. We are a county agency. I do not know what that investigation entailed.

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF SAGINAW
FAMILY DIVISION

MELISSA JAYNE CALICE,

Plaintiff,

vs.

RICHARD ANTHONY CALICE, JR.,

Defendant.

File No. 12-017215-DM-1

HON. JAMES T. BORCHARD

BURKHART, PICARD,
TIDERINGTON, & McLEOD, PLLC
BY: TIMOTHY R. McLEOD (P29880)
THOMAS D. BURKHART (P25509)

Attorneys for Plaintiff
820 N. Michigan Avenue
P.O. Box 6055
Saginaw, Michigan 48608
(989) 753-4441

RICHARD ANTHONY CALICE, JR.
Defendant In Pro Per
10 Ringleaf Court
Cockeysville, Maryland 21030

PLAINTIFF'S TRIAL BRIEF

Prepared By:

BURKHART, PICARD,
TIDERINGTON, & McLEOD, PLLC
BY: TIMOTHY R. McLEOD
Attorney for Plaintiff
820 N. Michigan Avenue
P.O. Box 6055
Saginaw, Michigan 48608

GENERAL INFORMATION

Date of Marriage: August 6th, 2005

Date of Separation: August 2nd, 2012

Date of Filing: August 13th, 2012

Parties:

Plaintiff: Melissa Jayne Calice

Date of Birth: 12/01/1974

Health: Good.

Employment: North Saginaw Charter Academy - School Social Worker

Income: 2013 Income was \$40,218.00

Number of Marriage: First

Defendant: Richard Anthony Calice, Jr.

Date of Birth: 12/12/1978

Health: Good.

Employment: Catered Occasions, LLC a/d/b/a Borowiecki & Associates

Income: \$6,400.00 per month

Number of Marriage: First

Issues:

Property Division

Retirement Plans

Spousal Support

Attorney Fees

BACKGROUND INFORMATION

The parties were married on August 6th, 2005 in Charlevoix, Michigan. Two children were born during the marriage: Rocco Jefferson Calice, d/o/b 10/27/2006 and Amelia Jayne Calice, d/o/b 04/25/2008. The parties separated on August 2nd, 2012 at which time Plaintiff, Melissa Jayne Calice returned to her home state of Michigan with the two minor children. Plaintiff, Melissa Jayne Calice initiated a Separate Maintenance proceeding on August 13th, 2012 which was subsequently amended to a divorce proceeding on September 13th, 2012.

Defendant holds a bachelor's degree and MBA. He was employed with FEI.COM until February, 2014. In July, 2014, he began employment with his current employer, Catered Occasions, LLC a/d/b/a Borowiecki & Associates. His current income is \$6,400.00 per month.

Plaintiff holds a bachelor's degree and Master's in Social Work. She has a Michigan teaching certificate and a license for Social Work in the State of Michigan. She is currently employed at North Saginaw Charter Academy and earns an annual income of \$40,218.00.

The parties' essentially lived apart from October, 2009 to October, 2011. Plaintiff lived in the parties' home in Royal Oak, Michigan with the minor children and Defendant lived and worked in Maryland; returning home on the weekends. In October, 2011, in an attempt to save their marriage, Plaintiff relocated to the State of Maryland with the minor children. Defendant reassured Plaintiff their marriage could be saved if she relocated and if the attempt failed, she could return to the State of Michigan. The parties attended counseling in a final attempt to save the marriage. The end result was Plaintiff returning to the State of Michigan on August 2nd, 2012 with the minor children and filed a Complaint for Separate Maintenance on August 13th, 2012. A First Amended Complaint For Divorce was subsequently filed on September 13th, 2012.

Defendant's counsel filed a Motion for Summary Disposition arguing that Michigan

lacked jurisdiction under the Uniform Child Custody Jurisdiction Enforcement Act (UCCJEA). Plaintiff's counsel filed responsive pleadings. The issue of jurisdiction was resolved on October 18th, 2012 when a stipulated order was entered establishing jurisdiction in the Michigan Court.

Per the Findings and Order Re: Child Support, Child Support Credit, And Spousal Support dated June 30th, 2014, Child Support is payable by Defendant to Plaintiff in the amount of \$1,820.00 per month and Spousal Support in the amount of \$534.00 per month. The Spousal Support is payable until the Kate Spade dishes are returned (unbroken) or upon entry of the Judgment of Divorce. Spousal Support collection was not enforced at the time of entry of this order due to Defendant's then unemployment status; the order further states that Spousal Support shall be paid out of his portion of the property settlement. The Spousal Support arrearage is \$8,010.00 for the period June, 2014 through August, 2015.

At all times during the pendency of this proceeding, Plaintiff has had primary physical Custody of the two minor children. Prior to December, 2014, the parties had joint legal Custody. During December, 2014, Judge Fred L. Borchard entered his order establishing sole, legal Custody with Plaintiff pending review by Jill Hogenson. Jill Hogenson issued her report which Plaintiff has objected to, recommending joint, legal Custody of the minor children with significant handcuffs being placed on Defendant in an effort to control his erratic behavior. Defendant has repeatedly indicated he does not intend to comply with court orders and continues his abusive and intimidating conduct as evidenced by various e-mails attached.

ASSETS/LIABILITIES

This is a minimal asset case. A review of the parties' financial circumstances would indicate that liabilities far exceed any assets.

Assets -

Real Property – the parties jointly owned a parcel of real estate located at 620 Catalpa, Royal Oak, Michigan. The property has been occupied by a tenant. The monthly rental amount was being deposited into the Iolita account of Plaintiff's attorney pursuant to a stipulated order dated October 1st, 2013. These monies were used to make a 1st mortgage payment to 1st State Bank and insurance premiums as they became due. Plaintiff's counsel received notification that a 2nd mortgage was in default because Defendant had not made the previous mortgage payments for the months of June, July, August and September, 2013. The monthly tenant amount was insufficient to pay on the 1st mortgage, 2nd mortgage and accruing expenses.

Following unsuccessful Mediation held in December, 2014, the property went into foreclosure with 1st State Bank and a Sheriff's Deed was recorded with the Oakland County Register of Deeds on February 24th, 2015. The redemption period ends August 24th, 2015.

Rental monies that are being held in the Iolita account of Plaintiff's counsel total \$10,890.90. This amount includes the security deposit refund of \$1,477.82.

Motor Vehicles – Plaintiff's has a high mileage Cadillac SUV.

Defendant is currently driving a vehicle acquired during the pendency of this divorce following the fire loss of his prior vehicle. Presumably, this vehicle is without debt having been paid for from the insurance proceeds. Type of vehicle and value will be determined and provided to the Court at trial.

Retirement Accounts – the marital retirement accounts include Defendant's Fidelity 401(k) Plan with a December, 2013 balance of \$46,200.00 (Defendant withdrew \$8,342.00 of this amount during June, 2014 to pay support arrearages). In addition, at the time of filing, there was a Morgan Stanley account which Defendant drew down during the pendency of the proceedings in violation of the Temporary Restraining Order. This withdraw was \$14,241.88.

Personal Property – Court Appointed Special Master, William A. Brisbois entered an order directing Defendant to return certain personal property to Plaintiff. This has yet to be complied with and a contempt finding against Defendant has already been determined.

The outstanding list of items yet to be returned to Plaintiff are as follows: Amelia's Dresser; Buffet dining room set includes Kate Spade China ; Le Creuset Pot; Le Creuset Baker; Wustoff knives; Fiesta dishes (6); Red Fiesta Dishing with serving ware; all Clad pots; Dyson vacuum cleaner; self-made given to me by friends and relatives; access to all photography physical and online; baby picture collage made for each child; Wallace Silverware; "You Are Special Today" plate; Christmas decorations including ALL small houses and churches; Calphalon 4 qt. Slow Cooker; Crockpot 1-qt. Hook Up Double Slow Cooker; wooden baskets and bedside tables on either side of the master bedroom; Dark Brown Bookshelf in basement; Amelia's American Girl Doll; Turquoise Lamp; Large red Waterford Bowl; and Crate and Barrel Mixing Bowls. The total value of the items yet to be returned is approximately \$8,023.54.

Security Deposit – During the pendency of this matter, Defendant relocated from an apartment the parties had been residing in and there was a security deposit refund due the parties in the amount of \$4,950.00. An order has been entered depositing this amount in the Iolita account of Plaintiff's attorney. The actual amount received was \$1,477.82 because the landlord debited certain expenses of Defendant including rent, water bills and repair expenses.

Liabilities –

Student Debt – During the course of the marriage, Plaintiff acquired student debt. The outstanding amount as of November 29th, 2012 totals \$109,539.39. The student debt amount was used to pay for Plaintiff's education and in addition was used to fund marital expenses while these parties were together.

Tax Liability – the parties filed separate returns for 2012.

Defendant reports unpaid federal and state taxes for 2012 in an approximate amount of \$80,000.00. Presumably, this tax liability accrued because Defendant did not pay estimated taxes for his separate return. This is a separate liability of Defendant.

Credit Card Debt – Defendant's counsel advised the Court at a previous trial date that there was approximately \$60,000.00 in outstanding credit card debt. Plaintiff has no knowledge regarding this indebtedness nor the reason for the indebtedness. Defendant has provided Plaintiff's counsel with various credit statements in Defendant's name alone to substantiate this estimated \$60,000.00. A review of these various credit card statements shows a balance of \$22,485.18 which reflects balances owed by Defendant at the time of separation. Voluminous credit card statements were provided but do not reflect credit card balances due as of the date of filing; no additional statements have been provided.

Maryland Trip Reimbursement - During the pendency of these proceedings, Plaintiff travelled to Maryland to retrieve personal property and incurred expenses including U-Haul rental, etc. Defendant refused to release personal property. Plaintiff seeks reimbursement of these expenses totaling \$5,200.00.

CONCLUSION

Accordingly, Plaintiff would request this Court:

1. Enter its order continuing primary physical Custody of the two minor children with Plaintiff and establishing sole, legal Custody for Plaintiff with directives as reflected in her proposed order filed with her objection to the Jill Hogenson's report;

2. That Plaintiff pay her student loan debt; Defendant pay his credit card debt and tax obligations;
3. The Court award each party their current motor vehicle;
4. The Court enter the following monetary award in favor of Plaintiff:
 - a. One-half of Fidelity 401(k) October, 2013 balance i.e. $\$46,200.00 \div 2 = \$23,100.00$;
 - b. One-half of Iolita trust account monies (number includes security deposit refund of \$1,477.82) $\$10,890.90 \div 2 = \$5,445.45$;
 - c. One-half of amount of monies withdrawn from the Morgan Stanley account in November, 2012 i.e. $\$14,241.88 \div 2 = \$7,120.94$
 - d. Spousal Support arrearage for the period June, 2014 through August, 2015 totaling = \$8,010.00;
 - e. Maryland trip expenses reimbursement = \$5,200.00;Total award to Plaintiff = \$48,876.39.
5. The monetary award determined above be paid to Plaintiff from Defendant as follows: assignment of Fidelity 401(k) Plan (\$37,858.00) and assignment of Plaintiff's counsel's Iolita account monies (\$10,890.90).
6. Such other appropriate relief as deemed fair and equitable by this Court including attorney fees and costs.

Respectfully Submitted,


TIMOTHY R. McLEOD (P29880)
Attorney for Plaintiff

Dated: August 6, 2015

ASSETS/LIABILITIES**ASSETS****Real Estate**620 Catalpa
Royal Oak, MIForeclosed upon by 1st
State Bank

-0-

Motor Vehicles

Cadillac

Plaintiff;
Net Value

Minimal

Defendant's Motor
Vehicle

Minimal

Retirement Accounts

Fidelity 401(k) Plan

Defendant;
Balance as of 10/2013

\$46,200.00

Balance as of 6/2014 after
Defendant withdrew monies
to pay support - \$37,858.00Morgan Stanley
Account# 310-137762Balance before withdrawal
in violation of Temporary
Restraining Order 11/23/12

\$14,241.88

Security DepositsUnrefunded security deposit from
Maryland property

*\$4,950.00

*\$1,477.82 of the security deposit amount was received because accrued debts of Defendant.

Liabilities

-Student Loans

Nelnet – Stafford
LoansPlaintiff; Balance as of
11/29/2012

(\$30,694.27)

Direct Loans -

Plaintiff – Balance as of

Unsubsidized	11/29/2012	(\$71,165.39)
Direct Loans - Subsidized	Plaintiff – Balance as of 11/29/2012	(\$ 7,679.73)
tCredit Card Debt	Defendant	?
Unpaid Individual Tax Liability	Defendant	?
<u>Miscellaneous</u>		
Value of unreturned personal property to Plaintiff		\$8,023.54
TRM Iolita account		\$10,890.90

PROPERTY DIVISION**ITEM****PLAINTIFF****DEFENDANT****Real Estate**620 Catalpa
Royal Oak, MI

-0-

-0-

Motor Vehicles

Cadillac

X

Defendant's Motor
Vehicle

X

Retirement Accounts

Fidelity 401(k) Plan

\$23,100.00

\$23,100.00

Morgan Stanley
Account# 310-137762

\$ 7,120.00

\$ 7,120.00

MiscellaneousValue of unreturned
Personal Property

\$ 8,023.54

Subject: Fwd: I need to meet with you regarding the 2012 Hemeter elementary sexual assault on my then 6 y/o son

From: Tony Calice (tony.calice@gmail.com)

To: mjwcalice@gmail.com; bptm4@ameritech.net;

Date: Monday, December 15, 2014 2:33 PM

Hey guys

Sounds like we are meeting to talk about the Sexual Assault on Rocco. The question is, will Mary be advocating for the victim or trying to conceal it like Melissa's sexual assaults when she was a minor and pursuing diagnosis of mental illness?

I would like to forward you this thread as Melissa's YMCA of Maryland Email Address is no longer active.

Thanks,

- Tony

----- Forwarded message -----

From: Tony Calice <tony.calice@gmail.com>
Date: Mon, Dec 15, 2014 at 2:26 PM
Subject: Re: I need to meet with you regarding the 2012 Hemeter elementary sexual assault on my then 6 y/o son
To: Susan Prine <sprine@saginawcounty.com>
Cc: James Bailey <jcbailey@stcs.org>, Melissa Calice <melissacalice@ymaryland.org>, DOUGLAS TROMBLEY <DATROMBL@stcs.org>

Ms. Prine,

Thank you for your prompt attention to the Child Endangerment Issues that I hope will result in improved safety for all minors involved. I will meet on Thursday and our discussions will be transparently recorded. I will not honor Saginaw Court's desire to conceal the Saginaw Sponsored kidnapping and Sexual Assault of a minor.

Bottom Line: Rocco did everything you could ask of a young boy that was kidnapped and sexually assaulted by Saginaw, MI

- 2013
 - Rocco told his mother
 - Rocco to a supervision
 - Rocco told Court that promised to investigate this bully
- 2014 Rocco told his father no one did anything and that he was sexually assaulted

ISSUE:

- Sexual Assault of Minor in 2013
- Saginaw Court Neglect to investigate abuse and joint legal custody violation despite being informed by child in November of 2013.

Court rules for Thursday's Proceeding

Due to the questionable principals in Saginaw County, I am requesting permission to preserve our proceedings with video. The Saginaw Court actions will be subject to future intelligent conversations with principle'd elected officials intent on protecting minors from Conspiracy to Kidnap and Conceal Sexual Assault on a Minor.

Requested Witnessed:

- Officer Rania (sp?)
- Jill Hogenson
- Honorable Fred Bourchard
- Hall or his legal guardian
- ***If Rocco is correct, than Hall is likely in immediate danger and a sexual assault victim himself
- First State Bank President - Rick Goedert conspired to kidnap minor across state lines with identity fraud
- Maternal Grandmother - Mary Goedert that conspired to conceal sexual assault
- Paternal Grandmother - Ruth Anne Calice witnessed Officer Renia indicate that he had an interview with Rocco on 2013
- Former Attorney for Defendant - Tom Demetrio witnessed Officer Renia indicate that he had an interview with Rocco on 2013
- Jim Bailey - Principal of Hemmeter elementary
- Lisa Morford - Rocco's teacher at time of incident
- Negligent Saginaw Provider that misdiagnosed sexual assault as ADHA - Sandy Pfander
- Sue Prine - Negligent Saginaw Friend of the Court that Endorsed misdiagnosis of ADHD

Home State of Maryland

Remember Your Visit! To National Aquarium

Maryland Plaintiff Richard A Calice Jr
Maryland Driver's License Issued 8/7/2012

Maryland Residents immediately prior to the 2012 Saginaw Sponsored Kidnapping

7/28/2012: The Maryland Calice family visits the aquarium with their family membership.

Pictured (left to right): Son Rocco, Mother Melissa, Daughter Mia, and Father Terry

St. Paul's Lutheran Church Lutherville, Maryland



Saginaw Conspiracy to violate Michigan Principles

"The office is mandated by the Michigan Constitution and in accordance with Michigan Law is an elected office with a term of four years"
source: Saginaw Clerk

<http://www.saginawcounty.com/Clerk/>



2012 Saginaw Kidnapping of Oakland County, MI and Maryland Children from home state of Maryland Saginaw neglected to report kidnapping

Saginaw Court aware of 2013 telltale warning signs of Saginaw Child Abuse. In addition child tells Chief Judge Honorable Fred L. Borchard tells court about bully. Judge promises to investigate. Saginaw Court neglected to contact Saginaw school and child is sexually assaulted by the bully

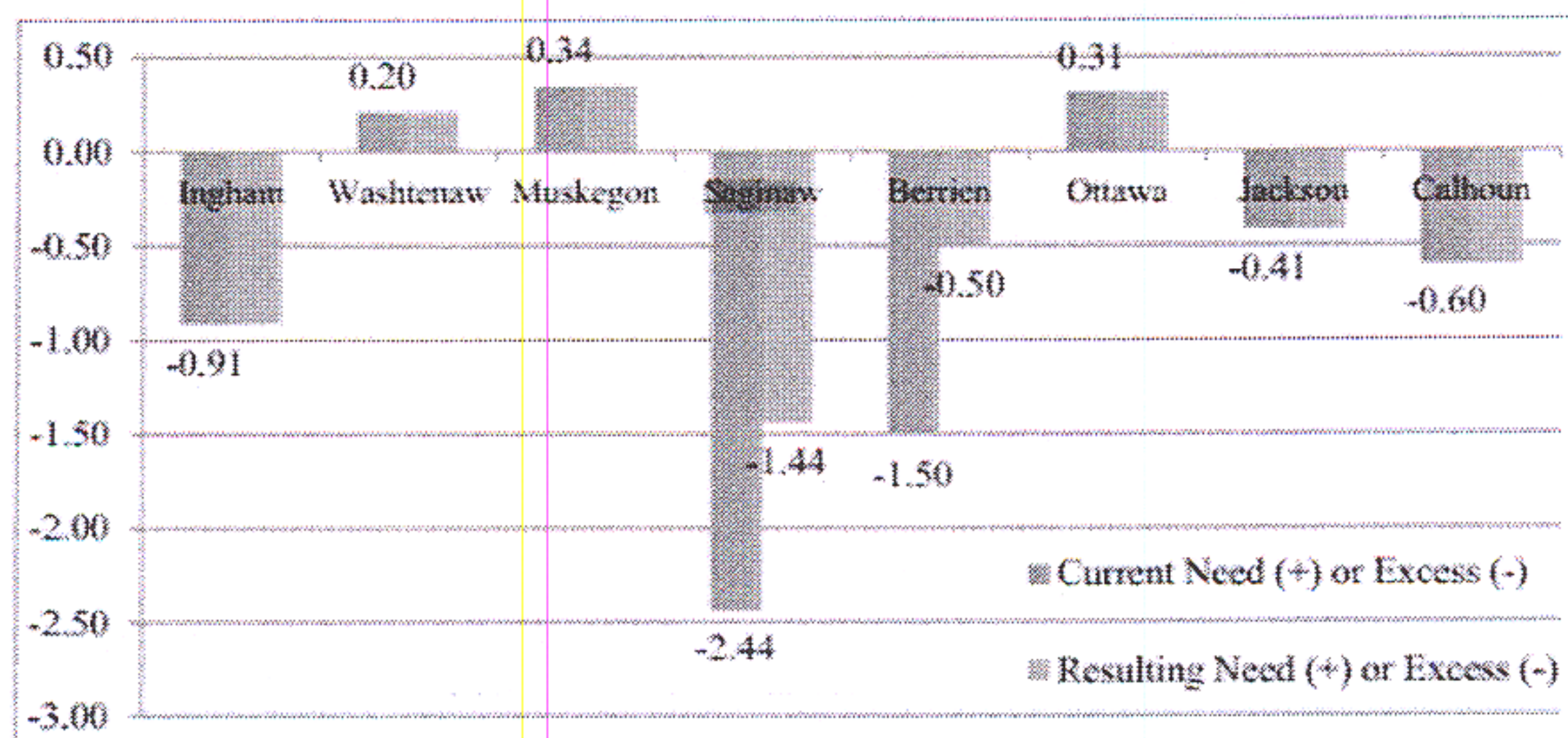
2014 Thanksgiving child tells his Maryland father that 2013 bully sexually assaulted him and that he told his mother, "school supervisor", and even the judge about this bully. Father shares concern with mother, school, and court.



"In order to file either a divorce or a separate maintenance action in Michigan, you must swear out a complaint stating that you have lived in Michigan for 180 days and in Saginaw County for 10 days before filing. Obviously, that isn't the case here. So, I don't know how Melissa or her lawyer can do that but apparently they did." (John Mills, 8/14/2012)

Comparable Courts

County	Census	Total Workload in Minutes	Judges Needed	Current			Recommended		
				Judge -ships	Need or Excess	Work-load Per Judge	Judge -ships	Need or Excess	Work-load Per Judge
Ingham	280,895	1,440,485	10.09	11	-0.91	92%	11	-0.91	92%
Washtenaw	344,791	1,391,604	10.20	10	0.20	102%	10	0.20	102%
Muskegon	172,188	1,336,427	10.34	10	0.34	103%	10	0.34	103%
Saginaw	200,169	1,310,094	10.56	13	-2.44	81%	12	-1.44	88%
Berrien	156,813	1,173,126	9.50	11	-1.50	86%	10	-0.50	95%
Ottawa	263,801	1,154,019	9.31	9	0.31	103%	9	0.31	103%
Jackson	160,248	1,067,108	8.59	9	-0.41	95%	9	-0.41	95%
Calhoun	136,146	1,031,472	8.40	9	-0.60	93%	9	-0.60	93%



By the way, here is an updated photo for Honorable Bourchard's Desk. I hope that looking at it will remind him about how serious Saginaw Child Endangerment it. This is the type of thing that happens Saginaw Sponsor's Kidnapping.



On Mon, Dec 15, 2014 at 8:15 AM, Susan Prine <sprine@saginawcounty.com> wrote:

I was out of the office Friday when these e mails came in. I contacted Judge Fred Borchard and he wants to know when you will be in town Thursday as, rather than going to the school, he wants this brought before him. Let me know when you will be arriving and I will get a hearing time from the Judge. Mr. Bailey has told me he will be there, I will be there, and both parties, as well as your wife's attorney. I need this info asap so I can get a hearing before the judge arranged with his schedule.

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

Subject: Re: Important Account Notice

From: Tony Calice (tony.calice@gmail.com)

To: reply-fe6616707d64047b751d-4039297_HTML-169097513-10060849-0@noreply.michiganlottery.com;

Cc: rickg@1ststatebk.com; sprine@saginawcounty.com; mrgoedert@gmail.com; bptm4@ameritech.net;

Date: Tuesday, April 28, 2015 4:25 PM

Also human trafficking at 62 Corral Dr.

The judge is in on it.


<http://tonycalice.wikispaces.com/similar+negligence>

On Apr 28, 2015 4:23 PM, "Tony Calice" <tony.calice@gmail.com> wrote:

My identity has been stolen by Tim McLeod.

<http://tonycalice.wikispaces.com/forbank>

On Apr 28, 2015 4:01 PM, "Michigan Lottery" <reply@noreply.michiganlottery.com> wrote:

VIEW ONLINE 



PLAYERS CLUB

Hi RICHARD!

• You Have 0 Points •

Log In

Dear RICHARD,

Starting April 29, 2015, Michigan Lottery accounts will be restricted to Michigan residents, and your account, which is associated with an out-of-state address, will be deactivated. If you currently have a Michigan address associated with your Michigan Lottery account please disregard this message.

Following this deactivation, you will no longer be able to login or participate in Players Club or Buy Online activities. All funds and point balances remaining in your account after April 29 will expire. You will have an opportunity to cash out any deposit balance remaining in your account from April 27-28, 2015. Stipulations may apply. Please contact customer service if you have any questions. If you have a balance of Reward Points in your account, we encourage you to redeem them in the Rewards Catalog. Any drawing entries you submit before April 29 will be valid.

If you have any questions, would like to request a withdrawal, or are currently a Michigan resident, please contact our customer service team at 844-887-6836. If you are a Michigan resident, proof of address and identity will be required to update your account.

This change only impacts Internet activities and does not impact the purchase and redemption of tickets at Michigan Lottery retailers. When in Michigan, we hope you continue to visit Michigan Lottery retailers to purchase a ticket for a chance to win cash prizes.

We apologize for any inconvenience and thank you for your support of the Michigan Lottery!



[Privacy Policy](#) | [Contact Us](#) | [Unsubscribe](#)

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Michigan Lottery, 101 E. Hillsdale, P.O. Box 30023, Lansing, MI 48909



**RESPONSIBLE
GAMING**

If you bet more than you can afford to lose, you may have a problem.

HELPLINE | 1-800-270-7117

TEXT | 248-648-3363

Subject: RE: Re: Child Endangerment - Unable to talk to the 62 Corral Dr Saginaw, MI human trafficking victims

From: Tony Calice (tony.calice@gmail.com)

To: sprine@saginawcounty.com;

Cc: sbernardoni@saginawcounty.com; rickg@1ststatebk.com; kennywbertram@sbcglobal.net; jcbailey@stcs.org; bptm4@ameritech.net; lamorfor@stcs.org; mjlw74c@yahoo.com;

Date: Wednesday, May 27, 2015 8:23 AM

What unknown country issued the passport for Anothny Calice? This illegal immigrant looks a lot like the Maryland resident Richard Anthony Calice, Jr.

By the way, you falsified my identity in the jail booking system. I provided you my Maryland drivers license and you created a fake passport record for an "Anothny Calice"

<http://tonycalice.wikispaces.com/forjail>

On May 27, 2015 6:12 AM, "Tony Calice" <tony.calice@gmail.com> wrote:

I think we need to shorten the feedback cycle on quality of that report. Please provide evidence that you initiated a report (ie referral information, contact, and release)

Due to a lack of transparency on your part, we have a nightmare on our hands.

On May 27, 2015 5:13 AM, "Susan Prine" <sprine@saginawcounty.com> wrote:

We dont do the investigation when we refer a case to PS/DHS for possible abuse – they are a state agency. We are a county agency. I do not know what that investigation entailed.

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

Subject: Re:

From: Tony Calice (tony.calice@gmail.com)

To: tjd@tomdemetriou.com;

Cc: sbernardoni@saginawcounty.com; rickg@1ststatebk.com; SABabcock@wwrplaw.com;
bptm4@ameritech.net; jbundgaard@michiganpropertymanagers.com; sprine@saginawcounty.com;
mjlw74c@yahoo.com;

Date: Sunday, May 31, 2015 11:38 AM

Can Tom Demetriou explain how a forged passport appeared on my jail booking information.

You had the proper spelling of my name on the Maryland driver's license I presented at booking.

Does rural Michigan Town judge Fred Bouchard now have the authority to revoke US Citizen status?

-t

On May 27, 2015 11:36 AM, "Tony Calice" <tony.calice@gmail.com> wrote:

Tom,

You can travel to 820 N. Michigan Ave. to collect your apology from the individuals utilizing my identity for concealing revenue.

Or the illegal immigrant "Anothy Calice" that spent some time in the Saginaw County Jail.

<http://tonycalice.wikispaces.com/forjail>

-Tony

On May 27, 2015 11:22 AM, "Tom Demetriou" <tjd@tomdemetriou.com> wrote:

Tony,

I do believe it is my ethical obligation not to disclose any issues you and I may have had. I did not believe we had any.

I have never let your inability to pay my fees in any way diminish my level of representation of you.

This last email from you is insulting to say the least.

We have always transmitted to you all documents, offers, and everything else we ever received on your behalf.

I do believe an apology is in order but that is up to you.

Tom

Demetriou & Associates, P.C.

Attorneys at Law

3262 Cabaret Trail, Suite 206

Saginaw, Michigan 48603

(989) 793-6440

Confidentiality Notice: Unless otherwise indicated or obvious from the transmission, the information contained in this document is privileged and confidential information intended for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify the sender and destroy the original message.

Subject: RE: Re: Child Endangerment - Unable to talk to the 62 Corral Dr Saginaw, MI human trafficking victims

From: Tony Calice (tony.calice@gmail.com)

To: sprine@saginawcounty.com;

Cc: rickg@1ststatebk.com; kennywbertram@sbcglobal.net; jcbailey@stcs.org; bptm4@ameritech.net; lamorfor@stcs.org; mjw74c@yahoo.com; mrgoedert@gmail.com;

Date: Monday, June 1, 2015 8:53 AM

Ms. Prine,

You are unapologetic in your lack of urgency and transparency regarding the two children kidnapped by residents in your rural Michigan community of Saginaw (made possible by forged documents and \$150 "filing fee" furnished by attorney Tom.McLeod).

I look forward to your furnishing the documentation of the CPS report and ensuring that no one is "on vacation" on date of trial.

-t

On May 27, 2015 7:29 AM, "Tony Calice" <tony.calice@gmail.com> wrote:

How would the judge even know who to subpoena if you can't even remember who you reported this to at CPS or furnish this concealed report you claim to have?

We need to move the trial up so that no one is out of town on vacation.

On May 27, 2015 7:01 AM, "Susan Prine" <sprine@saginawcounty.com> wrote:

No. Information is confidential. Subpoena PS worker. I don't know who it was but the judge can order them at trial to testify as to their investigation

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

TopSecret

Don't Go There Topics (Red Flag):

- The Saginaw, Michigan "don't go there topic" is: Endangered Maryland children enticed by Saginaw Michigan adults for a "10 day vacation". #ForgedCourtForms \$150 #BRIBE

On the copy are

- Kenny Bertram - Psychiatric Opinion
- Sue Prine - Michigan Court (Sue Prine)
- Similar Negligence
 - LISA BARTEL <labartel@stcs.org> ,
 - LISA MORFORD <lamorfor@stcs.org> ,
 - JAMES BAILEY <jcbailey@stcs.org> ,
 - DOUGLAS TROMBLEY <DATROMBL@stcs.org> ,
- Multiple parties that have assumed the identity of a person once known as Melissa Calice (43 Winterberry Ct/Cockeysville, MD 21030)
 - Mary Alice Goedert <mrgoedert@gmail.com> Simple Case of Saginaw, Michigan Identity Fraud ,
 - "Mr. and Mrs. Rick Goedert" <rickg@1ststatebk.com> - ForBank ,
- "Mr. Timothy McLeod" - Tim McLeod
- the school officials that "don't go there" to help vulnerable children, the court that accepted forged documents from Tim McLeod, and the multiple parties that have assumed the identity of a person once known as Melissa Calice (43 Winterberry Ct/Cockeysville, MD 21030).

Response to your request to participate in Saginaw conspiracy of "Don't go there topics": Rocco and Mia are entitled to their ideas and emotions. Please allow me to contact our children via phone and FaceTime while "theories" pertaining to rural town kidnapping are discussed by authority figures. To that end, I have organized some thoughts on that theory: <http://tonycalice.wikispaces.com/thoughts>
My knobs are that:

- 1) Our children, Rocco and Mia need to return to their home in Maryland where all conversations, emotions, and ideas are safe. They have at least one stable, resilient, parent with an awesome job in Maryland.
- 2) I look forward to continuing this constructive dialogue on pubic record.
- 3) The adults involved (everyone on the copy) need to assess damages and repair the disaster that was sponsored by 62 Corral Dr/Saginaw, MI (Rick and Mary Goedert). The attorney Tim McLeod of 820 N. Michigan Ave/Saginaw, Michigan was hired by them to abuse the legal process with forged documents and pay a "filing fee" so that the court clerk would rubber stamp the documents with the word "true".
- 4) The IRS and Maryland need to be made whole from the funds being embezzled in Michigan. My creditors need to be made whole so that my security clearance with homeland security can be restored.
- 5) I need my lost wages/revenue replaced. I need legal clarification that Melissa Calice does not represent the interest of children Rocco and Mia so that I can give them the childhood that will prepare them for success and joy in their adult life. That clarification needs to come from a Maryland court (once

Michigan dismisses fraudulent legal filings with prejudice).

6) You need a safe environment around positive people that admire instead of envy success.


7) Tom Demetriou has an outstanding legal bill of approximately 30k that needs to be paid

Bottom line: This problem can't be resolved until the rural town of Saginaw stops kidnapping and endangering my children.

10 Ringleaf Movies: Movies

10 Ringleaf Printers:

- Main Floor: Multi-Function Printer
- Basement: Laser Printer
- Basement: Scanner <http://192.168.1.18/index.asp>

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Subject: Re: hearing

From: Tony Calice (tony.calice@gmail.com)

To: sprine@saginawcounty.com; msp-missingpersons@michigan.gov;

Cc: rickg@1ststatebk.com; kennywbertram@sbcglobal.net; jcbailey@stcs.org; bptm4@ameritech.net; lamorfor@stcs.org; mjlw74c@yahoo.com; mrgoedert@gmail.com;

Date: Monday, July 13, 2015 3:36 PM

Attention Michigan State Police, how do I recover Maryland children from the Saginaw, MI kidnapping ring operating out of Fred Bourchard's courtroom.

Kidnapping sponsor Rick Goedert (62 Corral Dr/ Saginaw, MI) hired Saginaw, MI Tim McLeod (820 N. Michigan Ave Saginaw, MI) to produce and file counterfeit and forged legal documents regarding the identities of children across state lines. Saginaw Court Clerk (in exchange for \$150) neglected to verify residency and stamped the word "true" on the counterfeit document.

A forensic investigation (I have made report publicly available here: <http://tonycalice.wikispaces.com/onemansopinion>) has been performed and validates the truth of my claims and the true danger Saginaw, MI represents to the liberty and safety of Maryland children.

Legal action has been filed in the home state of Maryland; however, Michigan kidnapping sponsor Rick Goedert continues to interfere by paying to forge signatures on rural Michigan document. As the State of Michigan very well knows, the residence of Melissa and Tony Calice is in Maryland.

Sincerely,

Tony Calice

mobile: 248.506.2138

On Tue, Jul 7, 2015 at 4:26 PM, Tony Calice <tony.calice@gmail.com> wrote:
Ms Prine,

Saginaw, Michigan Court entered into a Creative Commons contract when they admitted materials from my wikispaces site into evidence. As such, I am requesting under the "Share alike" clause of the contract that you immediately disclose the findings of the CPS report and the Ms. Hogenson's Report.

Should I file this under "Similar Negligence" or under the "Sue Prine" record?

Sincerely,

- Tony Calice

On Tue, Jun 23, 2015 at 5:44 AM, Susan Prine <sprine@saginawcounty.com> wrote:

Plz note for anyone who is going to be at the hearing in late July. It has been reset to a different (earlier) date due to the judge being available. It was reset by the court – it is now scheduled for July 15th at 9 am.

Susan K. Prine

Saginaw County FOC

sprine@saginawcounty.com

County cell number 989 295 8383

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF SAGINAW
FAMILY DIVISION**

MELISSA JAYNE CALICE,

Plaintiff,

File No. 12-017215-DM-1

vs.

HON. JAMES T. BORCHARD

RICHARD ANTHONY CALICE, JR.,

Defendant.

BURKHART, PICARD,
TIDERTINGTON, & McLEOD, PLLC
BY: TIMOTHY R. McLEOD (P29880)
THOMAS D. BURKHART (P25509)

Attorneys for Plaintiff
820 N. Michigan Avenue, P.O. Box 6055
Saginaw, Michigan 48608
(989) 753-4441


RICHARD ANTHONY CALICE, JR.
Defendant In Pro Per
10 Ringleaf Court
Cockeysville, Maryland 21030

**PLAINTIFF, MELISSA JAYNE CALICE'S OBJECTION TO REPORT AND
RECOMMENDATION OF THE FRIEND OF THE COURT RE: LEGAL CUSTODY
DATED JUNE 3rd, 2015**

NOW COMES, Plaintiff, MELISSA JAYNE CALICE, by and through her attorney, TIMOTHY R. McLEOD and hereby objects to the Report And Recommendation Of The Friend Of The Court Re: Legal Custody Dated June 3rd, 2015 for the reason that Plaintiff believes the current arrangement of her having sole, legal Custody of the minor children is in the best interests of the minor children and that granting joint, legal Custody will only continue the turmoil that has been present over the years by Defendant's actions including his threatening, videotaping, audio taping and speaking disrespectfully to teachers, coaches, therapists and physicians involved with the minor children. Defendant has repeated stated that he believes the Saginaw County Court system has been an active participant in the kidnapping of his children and he would view any ordered entered by the Court as being directives he can ignore.

An alternative proposed order is attached.

Dated: August 6, 2015


TIMOTHY R. McLEOD (P29880)
Attorney for Plaintiff

BURKHART, PICARD, TIDERTINGTON, & McLEOD, PLLC., 820 NORTH MICHIGAN AVENUE, P.O. BOX 6055, SAGINAW, MICHIGAN 48608

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF SAGINAW
FAMILY DIVISION

MELISSA JAYNE CALICE,

Plaintiff,

File No. 12-017215-DM-1

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Attorneys for Plaintiff
820 N. Michigan Avenue, P.O. Box 6055
Saginaw, Michigan 48608
(989) 753-4441

RICHARD ANTHONY CALICE, JR.
Defendant In Pro Per
10 Ringleaf Court
Cockeysville, Maryland 21030

**ALTERNATIVE PROPOSED FRIEND OF THE COURT ORDER RE: LEGAL
CUSTODY**

AT A SESSION OF SAID COURT HELD IN THE
COURTHOUSE IN THE CITY OF SAGINAW, COUNTY OF
SAGINAW, AND STATE OF MICHIGAN, ON THE _____
DAY OF _____, 2015, A.D.

PRESENT: HON. JAMES T. BORCHARD, CIRCUIT JUDGE

This matter is before the Court on Plaintiff, Melissa Jayne Calice's Objection To Report
And Recommendation Of The Friend Of The Court Re: Legal Custody Dated June 3rd, 2015,

NOW THEREFORE,

IT IS HEREBY ORDERED AND ADJUDGED that the Plaintiff shall maintain sole,
legal Custody of the two minor children.

IT IS FURTHER ORDERED AND ADJUDGED that the Plaintiff shall see that the Defendant is advised of any major decisions involving the children's lives.

IT IS FURTHER ORDERED AND ADJUDGED that the Defendant shall interact in a professional manner with those individuals working with the minor children. He shall not threaten, video or audio tape, or speak disrespectfully to the individuals (Teachers, Coaches, Therapists, Physicians) who may be involved at any junction in the children's lives.

The Defendant shall see to Plaintiff having information necessary regarding any relevant professionals involved with the children during his Parenting Time periods.

IT IS FURTHER ORDERED AND ADJUDGED that the Court's prior order allowing the minor child, Rocco's physician(s) to prescribe medications for ADHD, and for this child to take these medications shall remain in full force and effect.

IT IS FURTHER ORDERED AND ADJUDGED that both parties shall see to giving the children any/all medication prescribed by their treating physician.

IT IS FURTHER ORDERED AND ADJUDGED the in either parent's absence, at an agreed upon major medical appointment/procedure, the absent parent shall provide the other parent written documentation for the treating physicians, for purposes of agreeing upon a course of treatment in their absence.

JAMES T. BORCHARD
Circuit Judge

Countersigned:

Deputy Clerk

Prepared By:

BURKHART, PICARD,
TIDERTINGTON, & McLEOD, PLLC
BY: TIMOTHY R. McLEOD (P29880)
Attorney for Plaintiff
820 North Michigan Avenue
P.O. Box 6055
Saginaw, Michigan 48608
(989) 753-4441

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY SAGINAW
FAMILY DIVISION

MELISSA JAYNE CALICE,

Plaintiff,

File No. 12-017215-DM-1

vs.

HON. JAMES T. BORCHARD

RICHARD ANTHONY CALICE, JR.,

Defendant.

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Attorneys for Plaintiff
820 N. Michigan Avenue, P.O. Box 6055
Saginaw, Michigan 48608
(989) 753-4441

RICHARD ANTHONY CALICE, JR.
Defendant In Pro Per
10 Ringleaf Court
Cockeysville, Maryland 21030

NOTICE OF HEARING

TO: CLERK OF THE COURT
Courthouse
Saginaw, MI 48602

FRIEND OF THE COURT
Courthouse
Saginaw, MI 48602

RICHARD ANTHONY CALICE, JR.
10 Ringleaf Court
Cockeysville, Maryland 21030

PLEASE TAKE NOTICE that Plaintiff, Melissa Jayne Calice's Objection Report And Recommendation Of The Friend Of The Court Re: Legal Custody Dated June 3rd, 2015, attached hereto, will come on to be heard before the Honorable JAMES T. BORCHARD, Circuit Judge, on the 12th day of August, 2015, at 9:00 a.m. in the morning or as soon thereafter as counsel may be heard.

Dated: August 6, 2015


TIMOTHY R. McLEOD (P29880)
Attorney for Plaintiff

BURKHART, PICARD, TIDERINGTON, & McLEOD, P.L.L.C., 820 NORTH MICHIGAN AVENUE, P.O. BOX 6055, SAGINAW, MICHIGAN 48608

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF SAGINAW
FAMILY DIVISION

MELISSA JAYNE CALICE,

Plaintiff,

File No. 12-017215-DM-1

vs.

HON. JAMES T. BORCHARD

RICHARD ANTHONY CALICE, JR.,

Defendant.

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(989) 753-4441

RICHARD ANTHONY CALICE, JR.
Defendant In Pro Per
10 Ringleaf Court
Cockeysville, Maryland 21030


PROOF OF SERVICE

STATE OF MICHIGAN)
COUNTY OF SAGINAW) ss.

KELLY R. GOMEZ, being duly sworn, deposes and says that she is an employee of TIMOTHY R. McLEOD and that on the 6th day of August, 2015, she filed the original Plaintiff, Melissa Jayne Calice's Objection To Report And Recommendation Of The Friend Of The Court Re: Legal Custody Dated June 3rd, 2015, Notice of Hearing, Trial Brief and Proof of Service with the Saginaw County Circuit Court Clerk with a copy of said documents upon Richard Anthony Calice, Jr., Defendant In Pro Per, 10 Ringleaf Court, Cockeysville, Michigan 21030 by enclosing same in sealed envelopes, postage prepaid, directed to the address as set forth herein depositing same in the U.S. Mail at Saginaw, Michigan and upon Saginaw County Friend of the Court, Courthouse, Saginaw, Michigan 48602 and Susan K. Prine, Saginaw County Friend of the Court, Courthouse, Saginaw, Michigan 48602.


KELLY R. GOMEZ

Subscribed and sworn to before me, a Notary Public, on the 6th day of August, 2015.


JILL A. BENDER, Notary Public
Saginaw County, Michigan
My Commission expires: 09-02-2017

BURKHART, PICARD, TIDERTINGTON, & McLEOD, PLLC., 820 NORTH MICHIGAN AVENUE, P.O. BOX 6055, SAGINAW, MICHIGAN 48608